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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff,

Plaintiff,

v.

FEDERICO CERETTI, *et al.*

Defendants.

No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 09-01161 (SMB)

**DECLARATION OF JESSA DEGROOTE IN SUPPORT OF THE
SUPPLEMENTAL MEMORANDUM OF LAW IN FURTHER SUPPORT OF
HSBC BANK BERMUDA AND CRAIG PERRY'S OPPOSITION TO TRUSTEE'S
MOTION FOR A LETTER OF REQUEST**

I, Jessa DeGroote, declare under penalty of perjury as follows:

1. I am an attorney duly admitted to practice law in this Court. I am an associate with the law firm of Cleary Gottlieb Steen & Hamilton LLP, counsel for HSBC Bank Bermuda Ltd. and Mr. Craig Perry (the "Objectors"). I respectfully submit this declaration in support of the Objectors' Supplemental Memorandum of Law in Further Support of their Opposition to the Trustee's Motion for a Letter of Request (the "Supplemental Memorandum").

2. Attached hereto as Exhibits A-D, for the Court's convenience, are true and correct copies of the following documents, which are cited in the Supplemental Memorandum, but which may not be easily accessible:

Ex. Document

- A Rules of the Supreme Court (Bermuda 1985), Rule 39/8(1)(b)
- B Evidence Act of 1905 (Bermuda), Part IIC, 27P
- C The Supreme Court Practice 1999: The White Book, Order 39, r.1
- D *NetBank v. Commercial Money Ctr.*, [2004] Bda L.R. 46

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on October 29, 2018 in New York, New York.

/s/ Jessa DeGroote
JESSA DEGROOTE